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January 19, 2024

**VIA ECF**

Honorable Michael A. Hammer  
United States District Court  
District of New Jersey  
Marthin Luther King Bldg.  
& U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

**Re: *Bell et al., v. American Income Life Insurance Company, et al.*, No. 2:22-cv-06913; Status Report**

Dear Judge Hammer:

This firm represents Plaintiffs Atiya Bell and Abel Flores (“Plaintiffs”) in the above-captioned lawsuit brought against Defendants American Income Life Insurance Company, Giglione-Ackerman Agency, LLC, Eric Giglione and David Ackerman (“Defendants,” and together with Plaintiffs, the “Parties”) for alleged unpaid overtime and minimum wages owed pursuant to the New Jersey Wage and Hour Law, N.J.S.A. § 34:11-56a et seq. Pursuant to Your Honor’s Order, ECF No. 35, I write on behalf of the Parties, with consent of Defendants’ counsel, to provide an update on the status of settlement.

Plaintiffs have settled this matter in principle with Defendants on an individual (non-class) basis. The Parties have exchanged drafts of the Plaintiffs’ respective settlement agreements with Defendants.

The Parties anticipate that Plaintiffs will file a Notice of Dismissal pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), with prejudice, by February 16, 2024.

The Parties thank Your Honor for your time and consideration with regard to this matter.

Sincerely,

/s/ Ryan P. McCarthy

Ryan P. McCarthy